

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

CASE NO.: 1:23-CR-00056-JKB

vs.

BRANDON CLINT RUSSELL,  
\_\_\_\_\_ /

**UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING**

Brandon Russell hereby files this Unopposed Motion to Continue Sentencing, requesting that the Court continue his sentencing hearing for a period of approximately 30 days, and in support thereof would show as follows:

1. Sentencing in this matter is currently scheduled for June 17, 2025.
2. Without disclosing privileged information, counsel would represent to the Court that an additional 30 days is required in order for counsel to complete his preparations for sentencing, including the filing of his sentencing memorandum on Mr. Russell's behalf. There is information counsel is waiting for, which will not be available in time for counsel to file the sentencing memorandum by the current deadline of June 3, 2025.
3. Counsel has discussed the requested continuance with the Government. AUSA Michael Aubin advised that the Government does not oppose the requested continuance.

Wherefore, counsel would respectfully request that this Honorable Court continue the currently scheduled sentencing hearing for approximately 30 days.

Dated: May 2, 2025

Respectfully submitted,

**/s/ Ian J. Goldstein**

Ian J. Goldstein (Admitted *pro hac vice*)

LAW OFFICES OF IAN GOLDSTEIN P.A.  
330 Clematis Street, Suite 209  
West Palm Beach, FL 33401  
Tel: (561) 600-0950

**/s/Kobie A. Flowers**

Kobie A. Flowers (Bar No. 16511)

Brown, Goldstein & Levy, LLP  
120 E. Baltimore Street, Suite 2500  
Baltimore, Maryland 21202  
Tel: (410) 962-1030

Counsel for Brandon Russell

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed via CM/ECF which will serve all parties of record on this 2nd day of May, 2025.

Respectfully submitted,

**/s/ Ian J. Goldstein**

Ian J. Goldstein (Admitted *pro hac vice*)

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